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**CROOK COUNTY BOARD OF COMMISSIONERS**

P.O. BOX 37  
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August 12, 2002

NEPA Task Force  
P.O. Box 221150  
Salt Lake City, UT 84122

Dear Task Force:

We appreciate this opportunity to offer input on ways to enhance the NEPA process. Crook County is currently engaging as a cooperating agency on the Black Hills National Forest Plan Amendment process. We would like to offer the following perspectives based on our experiences to date with NEPA implementation.

- Federal agencies should stay within the scope of the NOI for the project. Inconsistencies between the NOI and other project documents are not acceptable.
- Federal agencies should follow a process with a logical sequence. When at any step of the process, one should be able to trace back what the previous steps were, and show a logical progression to that point.
- When a federal agency takes a position on an issue, all of the agency personnel should be fully informed of that decision and represent the agency and its position in a consistent manner.
- Federal agencies should comply with the timelines and document length requirements set down by NEPA. Deviations from those requirements encumber the process.

The most important characteristic of an effective joint-lead or cooperating agency relationship/process seems to be efficient, timely communication and exchange of information between the parties involved. The ease and speed of electronic communications does facilitate the process, but should not be relied upon as the only medium of communication between meetings. Dependent upon their individual computer capabilities, cooperators can at times struggle with processing and printing out the large volume of information that the cooperators are asked to review and offer comments upon. If those same cooperators have any problems with their email capabilities, they could potentially miss important information and not be aware of the omission for some time. Lead-agency personnel may be forced to extend their timelines unnecessarily because of delays in their receipt of cooperator input. In the Black Hills, there are many local and state entities participating as cooperators -- the logistics of

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coordinating this process are challenging, to say the least. Communication between the many participants appears most effective when engaged on a number of levels, sort of a checks and balances method to make sure that important aspects are not overlooked.

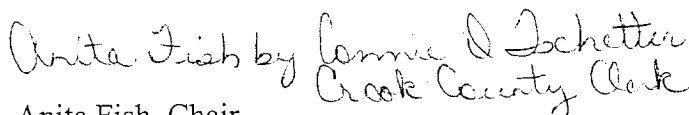
One of the obstacles to effective communication (that is, information out and substantive feedback received back in) can be the participants setting an unrealistic timeframe for the process. It is understandable that simultaneous completion of certain parts of the process will occur, but a reasonable amount of time then needs to be given to the cooperating agencies to digest the documents produced and provide quality responses to that information. Reasonable deviations from the established timetable may need to be accommodated at times, in the interest of encouraging substantive, informed input from the cooperators.

Thank you for considering our comments on this.

Sincerely,



Mark A. Semlek, Chair  
Board of Crook County Commissioners



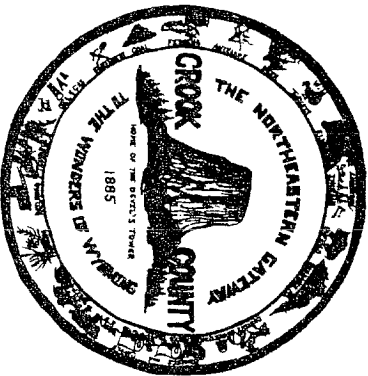
Anita Fish, Chair  
Crook County Land Use Planning &  
Zoning Commission

Office of  
**COUNTY COMMISSIONERS**

Crook County

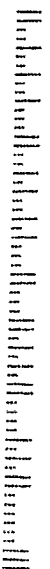
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